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7 Attorney for
A.B.

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 A.B., a minor, By and Through
11 W.F.B., His Guardian Ad Litem,

CASE NO. C 07-4738 PJH

12
13 v.

DECLARATION OF COUNSEL IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO
FILE AFFIDAVIT OF COUNSEL
UNDER SEAL

14 SAN FRANCISCO UNIFIED
SCHOOL DISTRICT,
15 Defendants.
16 _____/

17 Plaintiff, A.B., by and through W.F.B., his guardian ad litem, hereby file this Declaration
18 of Counsel, Roberta S. Savage, pursuant to Local Rule 7-11.

19 I, Roberta S. Savage, hereby affirm under penalty of perjury, that the following assertions
20 are true of my own personal knowledge and that I could and would testify competently thereto if
21 called as a witness to this action:

- 22 1. I am an attorney duly licensed in the State of California, and the United States District Court
23 for the Northern District of California.
24 2. I am one of the attorneys of record for A.B., plaintiff herein.
25 3. I make this declaration in support of PLAINTIFF'S MOTION FOR ADMINISTRATIVE
26 RELIEF TO FILE UNDER SEAL AFFIDAVIT OF COUNSEL IN SUPPORT OF PLAINTIFF'S

27
28 A.B. v. SAN FRANCISCO UNIFIED SCHOOL DISTRICT

Case No. C 07-4738

Declaration of Counsel in Support of Plaintiff's Administrative Motion to File Affidavit of Counsel Under Seal

1 MOTION TO PROTECT PLAINTIFF'S RIGHT TO PRIVACY BY PROCEEDING UNDER A
2 PSEUDONYM..

3 4. Good cause for this Administrative Motion exists in order to protect A.B.'s privacy rights by
4 ensuring that all personally identifiable information is filed under seal, including the information
5 included with the Affidavit of Counsel. The Affidavit contains a copy of the administrative
6 decision and specific personal information about A.B. and his family. This request is consistent
7 with Local Rule 3-17 (a)(2) requiring all minor's to be identified in pleadings through their
8 initials only.

9 5. A stipulation by Defendant District to have the Affidavit of Counsel filed under seal and to
10 have all documents that contain personally identifiable information about A.B. or his family filed
11 under seal was not obtained as the Complaint has not been served on Defendant District, and the
12 Defendant District has not otherwise been contacted about this matter.

13 6. Since the Affidavit of Counsel will be served on Defendant District with the Complaint,
14 there will be no harm to Defendant District as it will then have all of A.B.'s personally
15 identifiable information. Further, this Declaration and any Order from the Court will also be
16 served on Defendant to ensure that it can comply with the Orders related to A.B.'s privacy.

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18 Respectfully Submitted,
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21 Dated: September 19, 2007

22 Roberta S. Savage
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28 A.B. v. SAN FRANCISCO UNIFIED SCHOOL DISTRICT

Case No. C 07-4738